

**KAREN E. BEZNER, ESQ.**

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Attorney for Karen E. Bezner, Trustee

Karen E. Bezner  
KB 5770

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY

	:	In Proceedings for Liquidation
In the Matter of:	:	under Chapter 7 of the Bankruptcy
	:	Code
ROBERT S. GUINDI,	:	
	:	Hon. Kathryn C. Ferguson, C.U.S.B.J.
Debtor.	:	Bankruptcy No. 22-11556
	:	
	:	

NOTICE OF MOTION BY KAREN E. BEZNER, CHAPTER 7 TRUSTEE TO EXTEND  
TIME TO OBJECT TO DISCHARGE ON BEHALF OF THE CHAPTER 7 TRUSTEE  
AND THE OFFICE OF THE UNITED STATES TRUSTEE

TO: Office of the United States Trustee  
One Newark Center, Suite 2100  
Newark, New Jersey 07102

Joshua S. Bauchner, Esq.  
Ansell Grimm & Aaron, P.C.  
365 Rifle Camp Road  
Woodland Park, New Jersey 07424  
Counsel for the Debtor

Mr. Robert S. Guindi  
139 Johnson Place  
South River, New Jersey 08882  
Debtor

PLEASE TAKE NOTICE THAT the undersigned counsel for Karen E. Bezner, Trustee shall move before the Honorable Kathryn C. Ferguson, U.S.B.J. at the United States Bankruptcy Court, United States Courthouse, 402 East State Street, Trenton, New Jersey for an order, pursuant to Bankruptcy Rule 4004(b), extending the time within which said Trustee and the Office of the United States Trustee may move to object to the debtor's discharge pursuant to 11 U.S.C. Section 727 of the Bankruptcy Code, or move to dismiss or convert the case pursuant to 11 U.S.C. Section 707(b).

PLEASE TAKE FURTHER NOTICE THAT in support of the within application, the undersigned shall rely upon the Certification of Karen E. Bezner, submitted herewith. No brief is necessary for purposes of this motion, as the motion relies for its resolution upon uncontested issues of fact, and raises no contested issues of law. As required by local rule, a proposed form of order is submitted herewith.

PLEASE TAKEN FURTHER NOTICE THAT your response, if any, to the motion is due seven (7) days prior to the date scheduled for hearing thereon. Your response must be filed with the Clerk of the Bankruptcy Court, United States Courthouse, 402 East State Street, Trenton, New Jersey 08608 and served upon counsel for the Trustee. In the event that no timely response is filed and served, the Bankruptcy Court may grant the relief requested by the moving party without need for further hearing.

**KAREN E. BEZNER, ESQ.**  
Counsel for Karen E. Bezner, Trustee

By: /s/ Karen E. Bezner  
Karen E. Bezner

Dated: May 2, 2023